

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE FOREIGN EXCHANGE
BENCHMARK RATES ANTITRUST
LITIGATION

No. 1:13-cv-07789-LGS

**RESPONSE TO OBJECTOR GREGORY GALAN'S
MOTION TO WITHDRAW OBJECTION**

Although Class Counsel do not oppose Gregory Galan's request to withdraw his objection to their pending motion for attorneys' fees, for context, they respectfully direct the Court to several admissions in Mr. Galan's recent deposition:

- Mr. Galan did not know what this lawsuit was about.¹
- Mr. Galan could not name a single defendant, had not read any of the complaints, and did not understand what class he was in or what that class alleged.²
- Mr. Galan had no idea what Class Counsel did to litigate this case, how many attorneys worked on it, how many hours those attorneys worked, or what risks Class Counsel faced.³
- Mr. Galan did not have any objections to the requested attorneys' fees before talking to his lawyers.⁴

¹ Galan Depo. at 81:8-10 ("Q. Do you know what this lawsuit is about? A. No.").

² *Id.* at 81:11-82:11.

³ *Id.* at 104:14-105:15.

⁴ *Id.* at 104:9-13 ("Q. Did you have any objections to class counsel's requested attorneys' fees before talking to Mr. Pentz or Mr. Cochran? A. No.").

While Mr. Galan's health issues may be one factor influencing his decision to withdraw, another likely factor is the substance of his testimony and how it reflects on his lawyers.

DATED: April 10, 2018

Respectfully submitted,
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s/ Christopher M. Burke

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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2018, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/ Christopher M. Burke
CHRISTOPHER M. BURKE